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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

A.U. and M.U. v. Meta Platforms, Inc., et al.,
 4:24-cv-03231

C.A. individually and on behalf of C.J. v.
Meta Platforms, Inc. et al., 4:24-cv-03234

D.Z. individually and on behalf of K.Z. v.
Meta Platforms, Inc. et al., 4:24-cv-03232

Jessica Cannon-Lear on behalf of A.T. v.
Meta Platforms Inc., 4:24-cv-02924

S.O. and J.O., individually, and as next of
friends to minor Plaintiff, K.O. v. Meta
Platforms Inc., 4:24-cv-01989

Sasha Goldsmith individually and on behalf
of J.G. v. Meta Platforms, Inc., 4:24-cv-
 03235

S.G. individually and on behalf of L.P. v.
Snap, Inc., 4:24-cv-03233

M.H. and A.H. v. Meta Platforms, Inc., et al.,
 No. 4:24-cv-03831

**PLAINTIFFS' TENTH CONSOLIDATED EX
 PARTE APPLICATION FOR
 APPOINTMENT OF GUARDIANS AD
 LITEM**

APPLICATION

Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby submits Plaintiffs’ Tenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) for this Court’s consideration.

“Fit parents are presumed to act in the best interests of their children.” *J.B. by & Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021 WL 3115195, at *2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000); *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-RS, 2015 WL 7350183, at *1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the parent as guardian ad litem upon receipt of an ex parte application without exercising much discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL 2002370, at *3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-01165-AWI NEW (TAG), 2007 WL 1390672, at *3 (E.D. Cal. May 9, 2007)); *accord J.M. v. Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at *2 (N.D. Cal. Sept.16, 2016). However, “[w]hen there is a potential conflict between a perceived parental responsibility and an obligation to assist the court in achieving a just and speedy determination of the action, a court has the right to select guardian ad litem who is not a parent if that guardian would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at *1 (citations omitted) (internal quotation marks omitted).

Attached as Exhibits 1-8 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Tenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl.” or “Anderson Declaration”) are the *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) submitted by the parents and/or legal guardians of individual minor Plaintiffs in the following cases:

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- 1 • *A.U. and M.U. v. Meta Platforms, Inc., et al.*, 4:24-cv-03231 (Exhibit 1);
- 2 • *C.A. and C.J. v. Meta Platforms, Inc., et al.*, 4:24-cv-03234 (Exhibit 2);
- 3 • *D.Z. and K.Z. v. Meta Platforms, Inc., et al.*, 4:24-cv-03232 (Exhibit 3);
- 4 • *Jessica M. Cannon-Lear, on behalf of minor A.M.T., v. Meta Platforms Inc., et al.*, 4:24-
- 5 cv-02924 (Exhibit 4);
- 6 • *S.O. and J.O., individually, and as next of friends to minor Plaintiff, K.O. v. Meta*
- 7 *Platforms Inc., et al.*, 4:24-cv-01989 (Exhibit 5);
- 8 • *Sasha Goldsmith, Jason Goldsmith, and J.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-
- 9 03235 (Exhibit 6);
- 10 • *S.G. and L.P. v. Snap, Inc., et al.*, 4:24-cv-03233 (Exhibit 7); and
- 11 • *M.H. and A.H. v. Meta Platforms, Inc., et al.*, No. 4:24-cv-03831 (Exhibit 8).

12 Exhibits 1-8 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison
 13 Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the
 14 Anderson Declaration as Exhibits 1-8 are consistent with Attachment A to this Court's Guardian
 15 *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information
 16 (including address, email, and telephone number); (2) the name, case number, state of domicile
 17 (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or
 18 legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is
 19 fully competent and qualified to understand and protect the rights of the minor plaintiff and has
 20 no interests adverse to the interests of that person. Anderson Decl. ¶ 11.

21 Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or
 22 legal guardians in the cases listed above are deemed presumptively approved upon filing, as there
 23 is no apparent conflict between the applicants' parental responsibility and their obligation to assist
 24 the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing
 25 *J.M.*, 2016 WL 494299, at *1). This Court also ordered that, absent the filing of an objection, the
 26 presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is
 27 filed. ECF No. 122 ¶ 5. Therefore, the objection period will close on July 26, 2024.

28 Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte*

Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Applications submitted in the case listed above.

Dated: July 11, 2024

Respectfully submitted,

/s/ Jennie Lee Anderson

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